

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS LABORERS' DISTRICT COUNCIL,
Plaintiff

vs.

C.A. No. 04-12633 RWZ

AG ASBESTOS, INC.,
Defendant

VERIFIED REQUEST TO ENTER DEFAULT

Plaintiffs Massachusetts Laborers District Council request the Clerk to enter the default of AG Asbestos, Inc. (hereinafter "AG"). This request is made pursuant to Rule 55(a),

Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on December 16, 2004.
- 2) Complaint was served on defendant AG on February 3, 2005.
- 3) By letter dated February 17, 2005 AG, by its counsel, requested an extension of time until March 15, 2005 in which to file an answer, which request was agreed to by plaintiffs.
- 4) AG neither requested a further extension nor filed an Answer or other responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

MASSACHUSETTS LABORERS'
DISTRICT COUNCIL,

By their attorneys,

/s/ Anne R. Sills
Anne R. Sills, Esquire
BBO #
Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

Dated: March 25, 2005

VERIFICATION

I, Anne R. Sills, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

/s/ Anne R. Sills, Esquire
Anne R. Sills, Esquire

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Verified Request to Enter Default has been served by first class mail upon attorney Joel Rosen at Metaxas Norman & Pidgeon, LLP, 900 Cummings Center, Suite #207T, Beverly, MA 01915 this 25th day of March, 2005.

/s/ Anne R. Sills, Esquire
Anne R. Sills, Esquire